## IN THE UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

SAS MFG INC. and ALLAN D. BAIN,

Plaintiffs,

v.

Safe Life Defense LLC, and
NICHOLAS GROAT,

Defendants.

Safe Life Defendants.

Plaintiffs,

Safe Case No.: 4:24-cv-002923

## DECLARTION OF NICHOLAS GROAT IN SUPPORT OF HIS DEFENSE LLC'S MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION PURSUANT TO FED. R. CIV. P. 12(B)(2)

## I, NICHOLAS GROAT declare that:

- 1. I am over the age of eighteen years and am a resident of the State of Nevada. I make this declaration in support of my Motion to Dismiss for Lack of Personal Jurisdiction Pursuant to Fed. R. Civ. P. 12(b)(2).
- 2. I make this declaration based on my personal knowledge of the facts contained herein. If called as a witness, I could and would testify competently to the recitations set forth herein.
- 3. I am the founder and manager of Safe Life Defense LLC ("Safe Life"). I have served in that capacity since the company's formation in 2016.
  - 4. I live and work in the State of Nevada.
- 5. I do not have a Texas identification card or driver's license and am not registered to vote in Texas.

- 6. I do not own or rent any real property in Texas.
- 7. I did not undertake any action that in any way involved the State of Texas in this case.
- 8. I do not regularly visit Texas, although I have visited a few times for recreational and vacation purposes.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 9th day of September, 2024.

NICHOLAS GROAT